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Our File No.

26048-102

September 12, 2018

VIA ECF

Magistrate Judge Gary R. Brown
United States District Court
Eastern District of New York
Long Island Courthouse
100 Federal Plaza
Central Islip, NY 11722

Re: Wiggins v. The Garden City Golf Club, Docket No. 2:16-cv-05959

Dear Magistrate Judge Brown:

Farrell Fritz, P.C. represents the Garden City Golf Club in connection with the above-referenced matter. We write regarding the discovery schedule and commencement of summary judgment proceedings. Plaintiff consents to the proposed schedule.

On July 16, 2018, discovery was stayed pending the conclusion of the August 9, 2018 settlement conference. Order [ECF 37]. Unfortunately, the parties were unable to reach an amicable resolution at that time. We propose the following changes to the discovery schedule:

- All discovery related to the issue of independent contractor status shall be completed by **October 19, 2018**;
- The parties shall commence a motion for summary judgment in accordance with the District Court's rules on or before **October 31, 2018**.

We appreciate the Court's time and consideration of this application.

Respectfully submitted,

Domenique Camacho Moran

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cc: All attorneys of record (*via ECF*)